



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

June 29, 2015

Joan Suther, Project Manager, Oregon Sub-Regional  
Greater Sage-Grouse RMP Amendment/EIS  
Bureau of Land Management  
28910 Hwy 20 West  
Hines, Oregon 97738

Dear Ms. Suther:

The EPA has reviewed the BLM's Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final Environmental Impact Statement (EPA Project Number: 13-0040-BLM FEIS). Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We agree that changes in management of greater sage-grouse (GRSG) habitats are necessary to avoid the anticipated continued decline of populations across the range. According to information cited in the FEIS, statewide, acres of habitat for greater sage-grouse have declined by 21 percent from estimated acres of habitat before 1850.<sup>1</sup>

**Responsiveness to our Draft EIS comments**

In our comments on the DEIS we stated that we did not believe that Alternative E would be environmentally preferable because it would designate approximately 1.7 million fewer acres than the other alternatives as GRSG habitat. We are pleased to see that the Proposed Plan does not designate Alternative E's overall amount of habitat.

We also recommended that the FEIS include additional information on desired outcomes for conifer reduction and crested wheatgrass restoration. The desired outcomes described in the FEIS as Vegetation Objectives 1 through 9 are responsive to our recommendation.<sup>2</sup> The FEIS's Vegetation Objectives are responsive to our interest in desired outcomes because they are substantially more specific. For example, in the DEIS, Alternative D had only one broad Vegetation Objective. The FEIS's Proposed Plan has nine multi-part objectives. Altogether, the Proposed Plan's additional information on desired outcomes for encroaching conifers, invasive plants, sagebrush thinning, crested wheatgrass restoration, native plant diversity, invasive plant control, and percent sagebrush cover is substantially more protective than what was presented in the DEIS.

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<sup>1</sup> FEIS, p. 3-44

<sup>2</sup> FEIS, Table 2-2

We recommended a more precautionary approach to adaptive management. While the FEIS maintains a more reaction based approach - increasing protection when monitoring shows habitat and population declines - we appreciate the FEIS's additional adaptive management information. Improvements to the adaptive management and monitoring appendices help to increase the likelihood that the proposed adaptive management strategy will be effective.

The FEIS includes responsive information on our other DEIS comments, relating to: Restoration Opportunity Areas, consistency with conservation criteria, and Areas of Critical Environmental Concern.

In the interest of further improving the Proposed Plan between now and the Record of Decision, we offer the following recommendations.

**Consider calculating the disturbance cap on actual/effective habitat**

We appreciate the Proposed Plan's anthropogenic disturbance cap because we believe it will help to avoid and minimize the human development threat to GRSG in Oregon.

We are concerned, however, that including areas that are not currently supporting sagebrush cover (e.g., due to wildfire) in the calculation<sup>3</sup> may not be fully protective of the environment. GRSG depend on actual/effective habitat for survival. If habitat is lost due to wildfire, then there will be less habitat that can be impacted by anthropogenic disturbance, while avoiding adverse consequences for GRSG.

We believe a disturbance calculation based on actual/effective habitat would be a stronger incentive for restoration and recovery efforts related to fire and invasive species because stakeholders would need larger areas of actual/effective habitat to increase opportunities for development while remaining under the disturbance cap.

**Address implementation certainty for adaptive management**

We recommend that the final adaptive management document include management responses for instances where deadlines are not met because adverse impacts to GRSG will continue until causes of decline are addressed. Our concern about deadlines relates to the work of adaptive management teams. For example, the FEIS's Adaptive Management Strategy, Appendix D, states that recommended actions shall be developed, "...no later than within three months of convening the local adaptive management team..."<sup>4</sup> Appendix D does not state what would occur if this deadline is not met.

We suggest you consider a deadline-related management response that would turn a soft trigger monitoring result into an automatic hard trigger management response. For example, if a soft trigger is met, and the BLM does not receive suggestions for management responses in three months from the adaptive management team, then that soft trigger monitoring result would receive a hard trigger management response – such as "Make PHMA (*Priority Habitat Management Areas*) exclusion areas for new ROW authorizations."<sup>5</sup>

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<sup>3</sup> FEIS, p. I-4

<sup>4</sup> FEIS, p. D-8

<sup>5</sup> FEIS, p. D-9

Other management responses to consider that are listed in FEIS Appendix D depend on increasing or reallocating resources; for example, prioritizing affected areas for restoration, providing additional guidance for vegetation and fuels management, and moving wild horses. For actions that depend on increasing resources, we recommend that the final adaptive management document include additional information on the certainty of adequate resources for full implementation. For actions that depend on reallocating resources, we recommend that the final adaptive management document include additional information on the certainty that all necessary parties will approve, and that the BLM will be able to implement, the re-direction of resources based on GRSG monitoring information.

If you have questions regarding our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) , or Erik Peterson at (206) 553-6382 or [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit